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April 26, 2011

Dr. Jim Austin, Executive Director-Treasurer  
South Carolina Baptist Convention  
190 Stoneridge Drive  
Columbia, South Carolina 29210-8254

Re: April 25, 2011 Comments Regarding the Proposed Reclassification of Reedy Cove Creek

Dear Dr. Austin:

The South Carolina Department of Health and Environmental Control (Department) has received your comments regarding the proposal to reclassify Reedy Cove Creek, its headwaters, and Lake Chillywater to Outstanding Resource Waters (ORWs) of the State. We would like to take the opportunity to respond to your specific concerns and questions.

First, we would also like to note the many examples of your willingness to independently and while working with others, such as the South Carolina Department of Natural Resources (DNR), make substantive efforts to protect and enhance Camp McCall, Lake Chillywater, and Reedy Cove Creek. As your letter mentions, you have removed the existing discharge to Lake Chillywater and in cooperation with DNR, have installed the cold water discharge for the sole purpose of improving water quality conditions in Reedy Cove Creek below the dam at Camp McCall. You also have planted a natural area adjacent to Reedy Cove Creek and purchased another ten acres to limit commercial development in the nearby area, all with the intent of improving water quality in Reedy Cove Creek. The Department acknowledges that your organization clearly has demonstrated that you are a good steward of the important water resources located on your property and that you understand how important it is to make the efforts necessary to maintain, protect and even improve water quality for this generation and future generations.

May we also acknowledge that it is partly because of your efforts that we are proposing the reclassification of these waters. Your efforts have assisted in making these waters excellent candidates for ORW classification and the fact that you did remove the existing discharge allows us the opportunity to propose this reclass. We would now like to respond to each of the concerns contained in your letter and we will address them in the order they were presented.

Comment 1. Will the reclassification have any effect at all on the Convention's use, operation, maintenance of the current septic system and, if required, any eventual replacement of the current septic system with the same or a comparable system?

Response: As long as you maintain your septic system in good working order and consistent with how these systems are operated, this reclassification will have no effect on your use, operation, maintenance or replacement with the same or comparable system. The Department will note that this reclassification would prohibit the use of any type of direct discharge system to one of the proposed ORW waters. This is the main prohibition that the ORW classification includes.

Comment 2. Will this reclassification have any effect on the many recreational activities currently provided at the Camp, such as swimming, canoeing, kayaking, water sports, and several water slides?

Response: One of the main reasons that waters of the State are considered for the ORW classification has to do with exceptional recreational uses that occur on the waterbody. The fact that so many visitors come to Camp McCall for the purposes of enjoying those many recreational uses your letter mentions is again, why we believe that Lake Chillywater makes an excellent candidate for the ORW classification. The reclassification will maintain and protect those specific uses that are presently occurring at the Camp. If anything, the reclassification should ensure that the water quality necessary to support those recreational uses in and on the water will be maintained and protected for many generations to come.

Comment 3. Will the reclassification prevent future dredging on the lake?

Response: No. Dredging is allowed.

Comment 4. Will the reclassification affect our stormwater discharge into Reedy Cove Creek?

Response: Stormwater discharges are allowed in ORW waters as long as they do not cause significant degradation of the existing water quality. The discharge at the Camp has been in existence and there have not been problems associated with it, so if the Camp continues to operate and maintain its stormwater as it is currently; then the reclassification should have no effect.

Comment 5. Will the reclassification have any effect on the Convention's periodic timber harvesting on its property?

Response: Timber harvesting is allowed in areas with ORW waters in the vicinity. As long as timber harvesting is done in compliance with appropriate harvesting methods and with appropriate Best Management Practices (BMPs) in place, then the reclassification will have no effect on timber harvesting at the Camp property.

Comment 6. Will the reclassification impose any new requirements or limitations on the quantity of water being discharged from Lake Chillywater into Reedy Cove Creek?

Response: No. The uses of both Lake Chillywater and Reedy Cove Creek are equally important and protected by the reclassification. Clearly from previous experience, your Convention has been more than willing to work with other State agencies (DNR) to make modifications to the dam in order to improve the downstream habitat. If your Convention chooses to continue to work with DNR or others as to improvements or modifications with the dam or lake operation, then it will be at your discretion. Our Department will not be making any requirements to adjust how you operate the dam with regard to releases of water from Lake Chillywater.

Comment 7. Will the reclassification require any modifications to existing structures on our property or, in any way, impact the maintenance of those structures?

Response: No.

Comment 8. Will the reclassification impose any new restrictions on existing structures such that the existing structures will need to be torn down, moved, or modified?

Response: No.

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Comment 9. Will the reclassification impose any new requirements on operations at Camp McCall? The Convention wants to ensure that all existing structures at the Camp will be able to remain, be maintained, and even replaced if the reclassification is approved and enacted?

Response: No. The Convention has rights to keep, maintain, and replace all existing structures at the Camp.

Comment 10. The Convention wants to ensure that the reclassification will not impede the ability of the Convention to sell the property or place any restrictions on the marketability and development of the property for uses other than a summer camp? Will the reclassification impose any such restrictions?

Response: The convention may sell its property to anyone that they choose. The reclassification of Reedy Cove Creek, its headwaters, and Lake Chillywater would include only prohibitions for direct discharges of treated domestic, industrial, or agricultural waste treatment facilities or aquacultures or open water dredged spoil material. This regulatory language states that any facility that treats these types of waste material would not be allowed to discharge into Reedy Cove Creek, its headwaters, or Lake Chillywater nor would the Department allow dredged spoil material to be deposited into any of these waters.

Comment 11. Will the reclassification affect any riparian rights the law grants to owners of property on the banks of waters?

Response: No. All riparian rights provided by the law are still in place.

At this time, the Department would again like to commend the S.C. Baptist Convention on its history of protecting and maintaining the water quality of Reedy Cove Creek and Lake Chillywater. We hope that this response will assure you that you can support the reclassification of these very important and unique waters of the State. We look forward to hearing from you soon and to working with you as we progress through the promulgation process to reclassify these waters.

Please contact me directly at (803) 898-4330 or via email at [kirklagl@dhec.sc.gov](mailto:kirklagl@dhec.sc.gov). I will be adding your comments to those that we receive at the public meeting this evening as your letter requests and I hope that someone from your organization will be in attendance. Thank you.

Sincerely,



Gina Kirkland  
Bureau of Water

cc: Heather Preston, SCDHEC  
Anne Marie Johnson, SCDHEC